

SESSIONS, FISHMAN, NATHAN & ISRAEL, L.L.C.
200 Route 31 North, Suite 203
Flemington, NJ 08822
Phone (908) 751-5940
Fax (908) 751-5944
Attorneys for Defendant
American Coradius International, L.L.C.

LUZ M. TAMAYO,

Plaintiff,

v.

AMERICAN CORADIUS
INTERNATIONAL, L.L.C.,

Defendant.

**SUPERIOR COURT OF NEW JERSEY
LAW DIVISION – SPECIAL CIVIL PART,
HUDSON COUNTY**

DC-021040-11

**NOTICE OF FILING OF
NOTICE OF REMOVAL TO THE
UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

TO: Clerk of the Court
Superior Court of New Jersey
Law Division, Special Civil Part
Hudson County
595 Newark Avenue
Jersey City, NJ 07306

Yaakov Saks, Esq.
Law Offices of Matthew E. Rose
209 Main Street
Fort Lee, NJ 07024
Phone: (201) 482-8111 x136
Facsimile (201) 482-8190
Email: ysaks@theroselaw.com
Attorney for Plaintiff
Luz M. Tamayo

PLEASE TAKE NOTICE that this action has been removed to the United States District Court for the District of New Jersey. Attached hereto as Exhibit "1" is a copy of the Notice of Removal filed in the United States District Court effecting such removal.

PLEASE TAKE FURTHER NOTICE that in accordance with 28 U.S.C. § 1446(d), the Superior Court of New Jersey, Law Division – Special Civil Part, Hudson County, shall proceed no further in this action unless and until the action is remanded by the United States District Court for the District of New Jersey.

Dated: November 3, 2011

Respectfully submitted



Aaron R. Easley, Esq.
SESSIONS, FISHMAN, NATHAN & ISRAEL, L.L.C.
200 Route 31 North, Suite 203
Flemington, NJ 08822
Phone: (908) 751-5940
Fax: (908) 751-5944
aeasley@sessions-law.biz
American Coradius International, L.L.C.

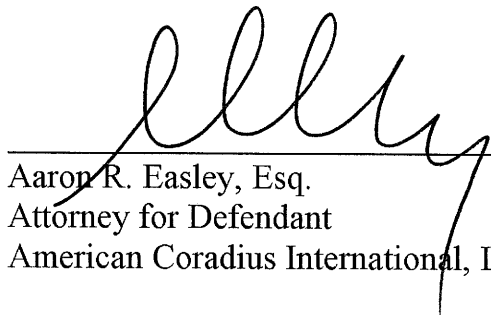
CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of November 2011, a copy of the foregoing **Notice of Filing of Notice of Removal to the United States District Court for the District of New Jersey** was served by Federal Express upon the Clerk of the Court and via regular mail upon the parties at the below addresses:

Clerk of the Court
Superior Court of New Jersey
Law Division, Special Civil Part
Hudson County
595 Newark Avenue
Jersey City, NJ 07306

Yaakov Saks, Esq.
Law Offices of Matthew E. Rose
209 Main Street
Fort Lee, NJ 07024
Phone: (201) 482-8111 x136
Facsimile (201) 482-8190
Email: ysaks@theroselaw.com
Attorney for Plaintiff
Luz M. Tamayo

By:



Aaron R. Easley, Esq.
Attorney for Defendant
American Coradius International, L.L.C.

EXHIBIT "1"

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

LUZ M. TAMAYO,

Plaintiff,

v.

AMERICAN CORADIUS
INTERNATIONAL, L.L.C.

Defendant.

NOTICE OF REMOVAL

PLEASE TAKE NOTICE that pursuant to 28 U.S.C. §§ 1331, 1441(b), and 1446, Defendant Amercian Coradius International, L.L.C. ("ACI"), by its attorney, hereby removes this action from the Superior Court of New Jersey, Law Division – Special Civil Part, Hudson County, to the United States District Court for the District of New Jersey. In support of this Notice of Removal, ACI states as follows:

1. Plaintiff Luz M. Tamayo originally commenced this action by filing a Complaint against ACI in the Superior Court of New Jersey, Law Division – Special Civil Part, Hudson County, where it is presently captioned as *Luz M. Tamayo v. American Coradius International, L.L.C.*, Docket No.: DC-021040-11. No further proceedings before the State court have occurred.

2. In the Complaint, Plaintiff alleges statutory causes of action against ACI. A true and correct copy of Plaintiff's Complaint is attached hereto as Ex. "A."

3. Plaintiff accuses ACI of violating the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.*

4. ACI was served with Plaintiff's Summons and Complaint on or about October 6, 2011.

5. This Court has federal question jurisdiction over Plaintiff's claim pursuant to 28 U.S.C. §§ 1331 and 1441(b) in that the claims are "founded on a claim or right arising under the . . . laws of the United States . . ."

6. This Notice of Removal is timely, having been filed within thirty (30) days of the date on which ACI was served with Plaintiff's Complaint. See 28 U.S.C. § 1446.

7. Written notice of this Notice of Removal of this action is being immediately provided to the Superior Court of New Jersey, Law Division – Special Civil Part, Hudson County. *See* Ex. "B."

8. Written notice of this Notice of Removal of this action is being caused to be served on counsel for the Plaintiff.

WHEREFORE, Defendant American Coradius International, L.L.C. gives notice that this action is removed from the Superior Court of New Jersey, Law Division – Special Civil Part, Hudson County, to the United States District Court for the District of New Jersey.

Dated: November 3, 2011

Respectfully submitted



Aaron R. Easley, Esq.

SESSIONS, FISHMAN, NATHAN & ISRAEL, L.L.C.

200 Route 31 North, Suite 203

Flemington, NJ 08822

Phone: (908) 751-5940

Fax: (908) 751-5944

aeasley@sessions-law.biz

Attorney for Defendant

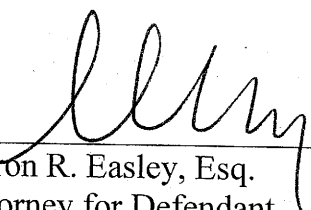
American Coradius International, L.L.C.

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of November 2011, a copy of the foregoing **Notice of Removal to the United States District Court for the District of New Jersey** was served by Federal Express upon the Clerk of the Court and via regular mail upon the parties at the below address:

Yaakov Saks, Esq.
Law Offices of Matthew E. Rose
209 Main Street
Fort Lee, NJ 07024
Phone: (201) 482-8111 x136
Facsimile (201) 482-8190
Email: ysaks@theroselaw.com
Attorney for Plaintiff
Luz M. Tamayo

By:



Aaron R. Easley, Esq.
Attorney for Defendant
American Coradius International, L.L.C.